IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA **Richmond Division**

CHRIS LACIVITA, an individual and)
ADVANCING STRATEGIES, LLC)
Plaintiffs,)
V.)
THE DAILY BEAST COMPANY, LLC d/b/a THE DAILY BEAST) Case No.: 3:25-cv-00227
Defendant.)

CONSENT MOTION FOR EXTENSION OF TIME TO SUBMIT **OPPOSITION AND REPLY BRIEFS**

COME NOW, Plaintiffs, Chris LaCivita and Advancing Strategies, LLC, by Counsel, and in and for their Consent Motion for extension of time to submit their opposition to Defendant's motion to dismiss, filed on July 14, 2025, and for Defendant to submit its reply brief, state as follows:

- 1. Defendant, The Daily Beast Company, LLC consents to an extension of time for Plaintiffs to file their opposition to Defendant's Motion on or before August 11, 2025;
- 2. Plaintiff, Chris LaCivita consents to an extension of time for Defendant to file its reply on or before August 25, 2025.

WHEREFORE, the foregoing considered, Plaintiffs, by counsel, move this Court to grant this consent motion and enter an order extending the deadline to submit their opposition brief to August 11, 2025, and the deadline for Plaintiff to submit its reply brief to August 25, 2025.

> **CHRIS LACIVITA and** ADVANCING STRATEGIES, LLC, by Counsel

DHILLON LAW GROUP, INC.

/s/ Jonathan Shaw

Jonathan Shaw (VSB No. 98497) Lee E. Goodman (VSB No. 31695) 2121 Eisenhower Ave., Suite 608 Alexandria, VA 22314 (703) 637-8754 Phone & Fax jshaw@dhillonlaw.com lgoodman@dhillonlaw.com

Mark Geragos (pro hac vice)
Tina Glandian (pro hac vice)
Setara Qassim (pro hac vice)
Geragos & Geragos, APC
644 S. Figueroa Street
Los Angeles, CA 90017
(213) 625-3900 Phone
geragos@geragos.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2025, I electronically filed the foregoing pleading using the CM/ECF System, which will send notifications of the filing to all counsel of record:

John D. McGavin (VSB 21794) McGavin, Boyce, Bardot, Thorsen & Katz, P.C. 9990 Fairfax Boulevard, Suite 400 Fairfax, VA 22030 Telephone: (703) 385-1000 Facsimile: (703) 385-1555 jmcgavin@mbbtklaw.com

Katherine M. Bolger, Esq. Meenakshi Krishnan, Esq. Davis Wright Tremaine LLP 1251 Avenue of the Americas, 21st Floor New York, NY 10020-1104 (212) 489-8230 Phone (212) 489-8340 Fax katebolger@dwt.com meenakshikrishnan@dwt.com

Counsel for Defendant The Daily Beast, LLC d/b/a The Daily Beast

> /s/ Jonathan Shaw Jonathan Shaw (VSB No. 98497)